

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Angela Michelle Scott, Debtor**

**Case No. 17-04706-JAW  
CHAPTER 13**

**APPLICATION TO BE EMPLOYED AS SPECIAL COUNSEL**

COMES NOW, Morgan & Morgan (“Applicant”), by and through undersigned counsel, and pursuant to 11 U.S.C. §327(e) and F.R.B.P. 2014(a), files this Application to be Employed Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

1. That Morgan & Morgan represent that in the administration of the above referenced Debtors’ estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtor’s personal injury claim. That debtor signed a fee agreement with Morgan and Morgan on 1/20/2023.
2. That the Applicant desires to be employed to render services in connection with the claim as Special Counsel for the Debtor.
3. That it would be in the best interests of the estate that said firm be employed.
4. An attorney for Morgan & Morgan has attached his affidavit hereto, stating that the firm is a disinterested party to Debtor’s estate. See Exhibit “A”.
5. That in consideration of said representation, Morgan & Morgan will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.
6. That the trustee has completed distributions and the plan has paid 100% to unsecured creditors. That this claim should be abandoned from the estate and the Debtor should be allowed to settle this matter without further approval of the bankruptcy court.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Morgan and Morgan as Special Counsel for the Debtor under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Morgan & Morgan, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
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**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to was forwarded on February 6, 2023, to the Debtor's attorney, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Application.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.